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U.S. Department of Justice

United States Attorney Southern District of New York

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BY ECF

September 15, 2020

Hon. Victor Marrero, United States District Judge United States District Court for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007-1312

Re: Jones et al. v. United States Postal Service et al., No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write respectfully to supplement the record for decision on Plaintiffs' motion for a preliminary injunction, ECF No. 19, by attaching the Supplemental Declaration of Robert Cintron (which was filed earlier today in the matter *Washington v. Trump*, NO. 1:20-cv-03127-SAB (E.D. Wash.)), and the Supplemental Declaration of Angela Curtis. *See* Exs. 1, 2. These Supplemental Declarations provide additional context about the July 10, 2020 "Stand-Up Talk" referred to in footnote 13 of Defendants' Opposition to Plaintiffs' motion. ECF No. 22 at 18 n.13. Both Mr. Cintron and Ms. Curtis are slated to provide testimony at the hearing scheduled for tomorrow, September 16, 2020. ECF No. 41 at 2. Plaintiffs consented to this supplementation of the record.

Respectfully,

AUDREY STRAUSS Acting United States Attorney for the Southern District of New York Attorney for Defendants

By: /s/ Rebecca S. Tinio REBECCA S. TINIO STEVEN J. KOCHEVAR Assistant United States Attorneys 86 Chambers Street, Third Floor New York, New York 10007 Tel.: (212) 637-2774/2715 E-mail: rebecca.tinio@usdoj.gov steven.kochevar@usdoj.gov